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AUG 29 2022

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Southern DIVISION

Tina A Parsons

(Enter above the full name of the Plaintiff[s] in this action).

vs.

The Davis Community

(Enter above the full name of ALL Defendant[s] in this action. Fed.R.Civ.P.10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary).

Case No. 7:22-cv-160-FL
(To be assigned by the Clerk of District Court)

COMPLAINT

1. Plaintiff resides at 973 Royal Tern Dr.
Hampstead NC 28443

2. Defendant(s) name(s): _____

Location of principal office(s) of the named defendant(s):

Nature of defendant(s) business: nursing home

Approximate number of individuals employed by defendant:

500+

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) ☐ Failure to employ me.
- (B) ☐ Termination of my employment.
- (C) ☐ Failure to promote me.
- (D) ☒ Other acts as specified below:

FMLA -

Right to Sue letter from EEOC

discrimination -

5. Plaintiff is:

(A) _____ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were 2/2011 - 10/2020.

Employment was terminated because:

(1) _____ plaintiff was discharged.

(2) _____ plaintiff was laid off.

(3) ☒ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) _____ my race.

(B) _____ my religion.

(C) _____ my sex.

(D) _____ my national origin.

(E) ☒ other as specified below:

FMLA

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Davis Community

8. The alleged discrimination occurred on or about

10/2020

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

I was out on FMLA and upon returning to work the administrative position I had the company did not place me back into same position.

10. The alleged illegal activity took place at:

1011 Porters Neck Rd
Wilmington NC

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about

3/2021

I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on

May 2022

12. I seek the following relief:

(A) ----- recovery of back pay;

(B) ----- reinstatement to my former job;

(C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including

injunctive orders, damages, costs and attorney's fees.

8/29/22
Date

Julie A. Purnins
Signature of Plaintiff
913 Poplar Turn Dr.
Hampstead NC 28443

910 538-8751
Address and Phone Number of Plaintiff